

LA-UR-21-25425

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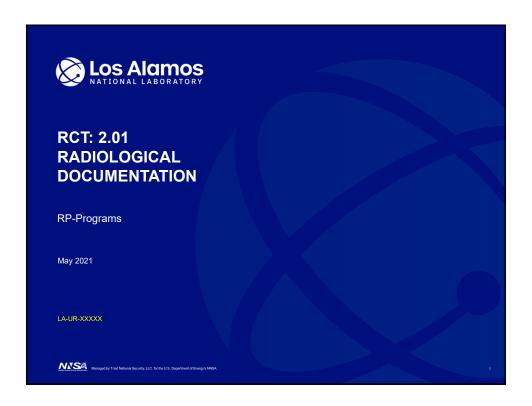
Title: RCT: 2.01 RADIOLOGICAL DOCUMENTATION

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Intended for: Training

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Overview

RCT: 2.01 RADIOLOGICAL DOCUMENTATION

10 CFR 835 establishes radiation protection standards, limits, and program requirements for protecting individuals from ionizing radiation resulting from the conduct of DOE activities. It is important to maintain the proper documentation to ensure that these standards and requirements are being met.

An RCT plays a vital role in supporting these requirements through proper documentation.



Terminal Objective

TO1: Given the need to perform duties as an RCT, recognize concepts of radiological documentation that pertain to the RCT position at Los Alamos National Lab in accordance with DOE-HDBK-1122, Radiological Control Technician Training.



Enabling Objectives

- EO1: Recognize types of radiological records in use at LANL (2.01.01).
- EO2: Recognize radiological work controls contained within Radiological Work Permits (RWPs) (2.01.02).
- EO3: Describe the RPIN system (2.01.02).
- EO4: Explain the Electronic Document Records Management System and locate RP procedures using the EDRMS or other methods (2.01.03).
- EO5: Explain the requirements for the records management system, such as Quality Control (QC), auditability/retrievability, and management information at LANL (2.01.03).



Section 1: Radiological Control Records



Radiological Control Record Use

 Radiological control records are needed to demonstrate the effectiveness of the overall Radiation Protection program at DOE facilities

Records are used to:

- Demonstrate the effectiveness of the RP Program
- Document afforded radiological safety
- · Plan work
- · Evaluate trends
- · Guide future performance goals
- · Demonstrate regulatory compliance





Radiological Control Record Use



Records may become the basis for:

- · Public disclosures
- · Legal proceedings
- · Medical assessments
- Audits to show compliance with company, state or federal requirements

Note: As Radiation Protection documents are legal records, it is important records be of high quality and readily retrievable.



LANL Record Qualities

P121, Chapter 20, Article 2011 states radiation protection records shall have the following qualities:

- Maintained to document radiological hazards and conditions and exposures to workers
- Legible, readily retrievable, appropriately protected, and maintained for the prescribed period of time
- · Handled to protect personal privacy



LANL Record Qualities

P121, Chapter 20, Article 2013 states the following types of radiological records must be maintained as required at LANL:

- Radiation Protection Program (RPP) policy documents requirements documents, and procedures
- · Individual radiological doses
- Personnel training (course records and individual records)
- As Low As Reasonably Achievable (ALARA) program implementation
- Radiological instrumentation tests, maintenance, and calibration
- Personnel monitoring-device testing, maintenance, and calibration
- · Radiological surveys



LANL Record Qualities

P121, Chapter 20, Article 2013 states the following types of radiological records must be maintained as required at LANL:

- · Area-monitoring dosimetry results
- Radiological Work Permits (RWPs)
- · Radiological performance indicators and assessments
- · Documentation of quality assurance activities
- Radiation Protection Initial Notification (RPINs)
- · RSS accountability and control
- · Release of material records
- Radiological safety reviews of facility designs, controls, and operations
- · Radiation Generating Device (RGD) survey reports





UTrain is the software tool used to access your training info.

• The URL for UTrain is: https://utrain.lanl.gov/



Exposure Reports

P121, Chapter 20, Radiation Protection Records and Reports, Article 2022, Personnel Radiological Records

- Procedures, data, and supporting information required to reconfirm an individual's dose at a later date must be maintained
- Individual monitoring records must be maintained and documentation of all occupational doses received during the current year
- Your annual Occupational Radiation Dosimetry Report can be found at: https://drp.lanl.gov



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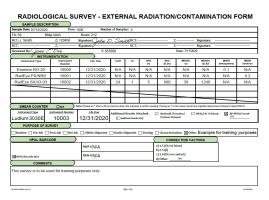
Examples of Forms Used for Documentation Instrument Check Tag (RP-PROG-FORM-041)								
	RP-PROG-041, r2 Cal Due: INSTRUMENT CHECK TAG					_		
	Instrument: Detector:					k Only		
	Serial #: Ref Range: _		Nuclide : α / β		α/β			
	Initial	Date	Initial	Date	Initial	α/β Date		
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Examples of Forms Used for Documentation

One of the most common survey forms is the Radiation/Contamination form (RP-PROG-FORM-114).

The first page contains information about the survey:

- Sample date and time
- Survey location
- · RCT surveyor information
- · Supervisor reviewer info
- · Instrument information
- · Purpose of survey
- · HPAL barcode for tracking
- Comments



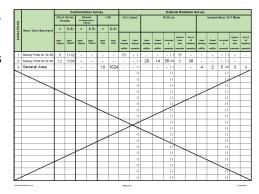
Note: This form is a fillable Adobe PDF form located on EDRMS.



Examples of Forms Used for Documentation

The second page contains the survey data:

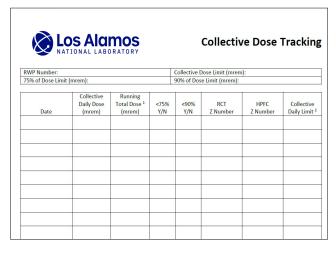
- · Item or area surveyed
- Direct, smear, and/or LAS contamination levels
- Dose rate on contact, at 30 cm, and/or at 1 meter from an item in a general area.
- If there are more survey data points that will not fit on the page additional pages can be attached.





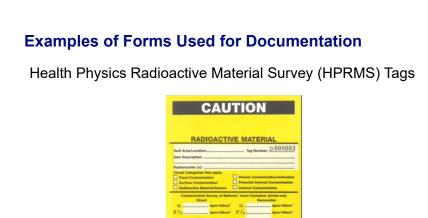
Examples of Forms Used for Documentation

Dose Tracking Log (RP-PROG-FORM-084)



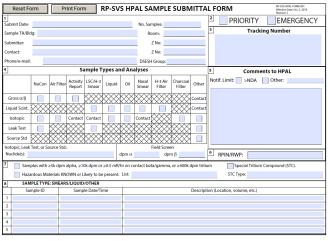
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Examples of Forms Used for Documentation HPAL submittal form (RP-SVS-HPAL-FORM-001)

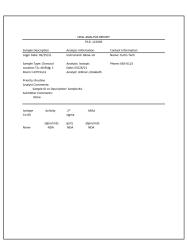


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Examples of Forms Used for Documentation

HPAL Analysis Report

 Routine or special sample analysis generally performed at the Health Physics Analysis Laboratory (HPAL)





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Examples of Records and Reports at LANL

Examples of radiological records and reports are:

- Radiological Work Permits (RWPs)
- Radiation Protection Initial Notification (RPIN)
- · Contamination survey (LAS, smear, and/or direct)
- · Radiation survey for external radiation
- Air sample survey
- Tritium survey (H-3)
- Environmental surveys (Soil, Water)
- · Nasal smears
- Item release surveys (including release logs)
- · Incoming and outgoing RAM shipment surveys
- · Area or room surveys
- RP owned RAM (respirators, instruments, samples, etc.)
- · Exposure records



Records and Reports at LANL - RWPs

When are RWPs required?
P121, Chapter 11, Radiological Work Control

Areas	Entry				
Radiation Area (RA) Contamination Area (CA) High Radiation Area (HRA) 0.1 to 1 rem in 1 hr @ 30 cm	In accordance with the FRPR (if established) or a Radiological Work Permit (RWP), including Radiological Worker (RW) as minimum training				
HRA >1 rem in 1 hr @ 30 cm Very High Radiation Area (VHRA) High Contamination Area (HCA) Airborne Radioactivity Area (ARA) Hot Job Exclusion Area³ (HJEA)	RWP is required for entry into these areas. Requirements in <u>Article 1124</u> also apply.				
^a When HJEA is established to control access during planned radiological work, an RWP is required for entry. When established in response to an emergency situation, emergency response procedures are used, including those for access control.					



Records and Reports at LANL - RWPs

P121, Chapter 11, Radiological Work Control

Table 11-4. Radiological Work Permit (RWP) and Integrated Work Document (IWD) Decision Requirements for Radiological Work

Hazard Grading Questions

Does the work involve any of the following?

- Work that could contaminate uncontrolled areas or the environment;
 Work in (or likely to create) an Airborne
- Work in (or likely to create) an Airborne Radioactivity Area (ARA) with levels >40 derived air concentration (DAC);
- Dose Rate >1 rem/hr in the work area (equivalent dose to whole body, at 30 cm from accessible surfaces);
- Extremity / shallow dose rate >10 rem/hr (considering all radiations, at contact with accessible material or device); or
 Work expected to create uncharacterized
- radiological conditions, including:

 working outside engineered controls, or
- working outside engineered controls, or
 breaching engineered containment systems.

YES – This is *High-Hazard* radiological work, and an Integrated Work Document (IWD) and Radiological Work Permit (RWP) are required.

NO - Continue with questions below.

Examples

- Remediation of legacy contamination in proximity to uncontrolled areas
- Decontamination of liquid waste containment systems
- Opening a highly contaminated radioactive material shipment
- Retrieving, packaging, shipping, and receiving high activity activation products
- Breach of internally contaminated systems where the breach could create an airborne radioactivity hazard, including maintenance or troubleshooting activities on actinide hoods, gloveboxes, and associated ventilation systems
- ventilation systems

 Decontamination and demolition of radiological facilities or contaminated systems



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Records and Reports at LANL - RWPs

P121, Chapter 11, Radiological Work Control

Table 11.4. Radiological Work Permit (RWP) and Integrated Work Document (IWD) Decision Requirements for Radiological Work

Hazard Grading Questions

Does the work involve any of the following? • Dose Rate >5 mrem/hr and <1 rem/hr (equivalent dose to the whole body, at 30 cm from accessible surfaces):

- Extremity / shallow dose rate >50 mrem/hr and <10 rem/hr (considering all radiations, at contact with accessible material or device);
 Work in (or likely to create) a High Contamination Area (HCA);
- Work in (or likely to create) a Contamination Area (CA); or
- Work in (or likely to create) an Airborne Radioactivity Area (with levels between 1 and 40 DAC pr > 12 DAC-hr in a week).

YES – This is **Moderate-Hazard** radiological work, and an IWD (or "qualified worker") and either an RWP or FRPR (for routine, stable, well-characterized conditions) are required. See Table 11-3 for RWP thresholds; work with a high activity radioactive sealed source (RSS) >100 mrem/hr at 30 cm requires an RWP. NO – Continue with questions below.

Examples

- Use of an accountable source with a dose rate greater than 5 mrem/hr at 30 cm to performance test health physics instruments
- Routine handling of dispersible radioactive materials within intact engineered controls, where the activity and work area are stable, well-characterized, controlled in accordance with the Facility Radiation Protection Requirements document (FRPR), and where sustained performance demonstrates effective controls (such as routine glovebox work).



Records and Reports at LANL - RWPs

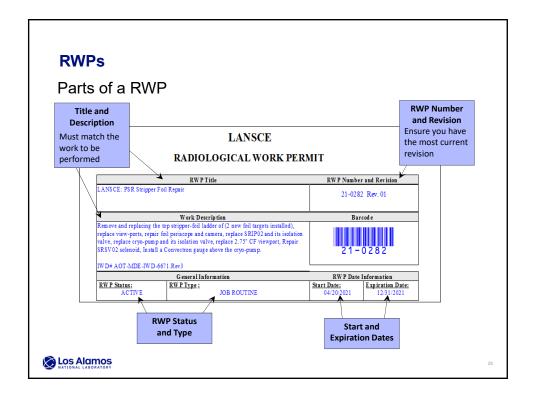
A Radiological Work Permit (RWP) is a document that is associated with control of work involving radioactive material and/or radiation hazards.

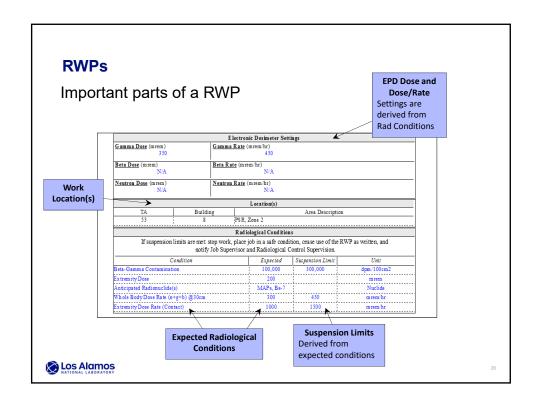
Documentation associated with a RWP includes:

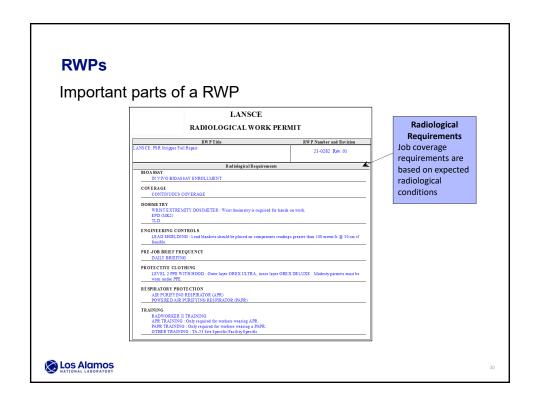
- · The RWP document itself
- The RWP Pre-Job Briefing Log
- Pre, During, and Post-job Surveys
- Dose Records

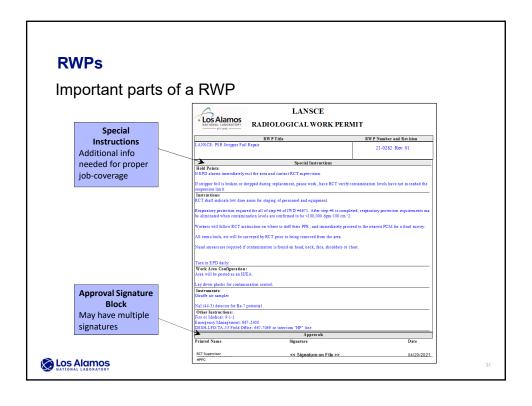


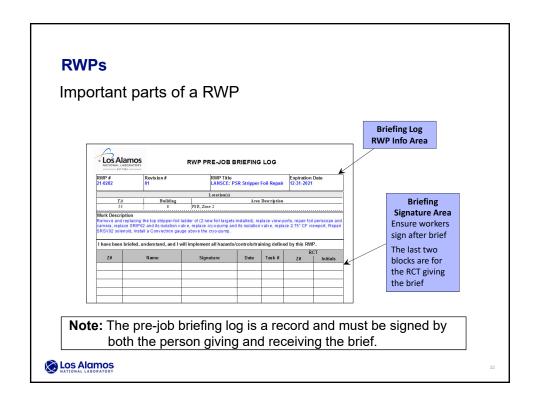








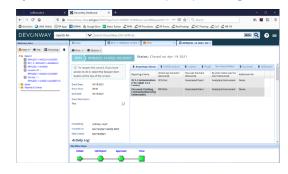




Radiation Protection Initial Notification (RPIN)

The Radiation Protection Initial Notification (RPIN) system is an application to capture, document, and record radiological conditions, metrics, and/or incidents at LANL. To access the RPIN system use the Radiation Protection Applications Catalog (RPAC). The URL for RPAC is: https://rpac.lanl.gov

- Limited distribution to facility and management stakeholders
- Initial notification sent immediately
- May take up to 30 days to close



Note: All RCTs will receive RPIN training prior to qualification.



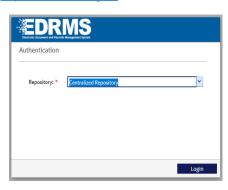
Section 3: Records Management System Requirements



Radiation Protection Resources

The Electronic Document Records Management System (EDRMS) is the official records repository for LANL. All RCT candidates will be granted access as part of their initial training.

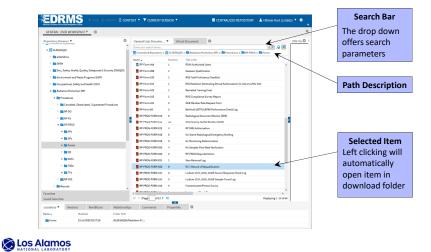
- The URL for EDRMS is: https://edrms.lanl.gov/
- On the home screen select "Centralized Repository"





LANL Official Records Repository

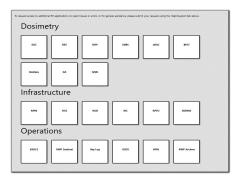
RP Programs procedures, forms, and other records are located in the RP-PROG folder and its sub-folders.



Radiation Protection Resources

RP software and computer programs can be found at the Radiation Protection Applications Catalog (RPAC). Click on the desired link to open the application.

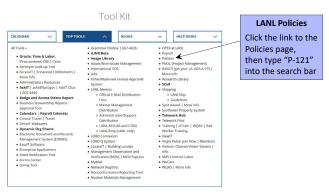
• The URL for RPAC is: https://rpac.lanl.gov





LANL Policy Documents

LANL policy documents can be found on the LANL homepage in the "Top Tools" area.



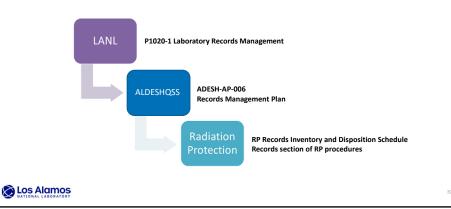
Note: P-121 can also be located by using the search bar on the LANL homepage.



LANL Records Guiding Documents

Documents in the Records Management Program should be managed in a consistent, cost-effective, compliant, and value-added manner.

The documents below implement the laboratory records system.



Performance Assurance

There are three primary Radiation Protection performance assurance processes at LANL: The 10 CFR 835 Triennial Assessment, Radiation Protection Initial Notifications (RPINs), and Radiation Protection metrics (contained within the RPIN system).

- The Triennial Assessment is an internal audit of the Radiation Protection Program (RPP)
- The Radiation Protection Initial Notification (RPIN) system is an application to capture, document, and record radiological conditions, metrics, and/or incidents at LANL



Records Management System Requirements

General Records Requirements:

- · Document all records in black or blue ink
- · For corrections (as near as possible to the lined out information)
 - Draw a single line through the incorrect information
 - Provide initials of the individual making the correction
 - Provide the date of the correction
 - Record the correct information, as applicable
- Records shall be made in such a manner that they provide sufficient detail to be understood by personnel who were not present at the time of entry
- · Ensure every space is filled in and no spaces are left empty
 - If a portion of the record is not used you may use "N/A", /, --, or xxx
- The use of arrows to signify continuous data or unused spaces is not permitted



Records Management System Requirements

General Logbook Requirements:

- Area logbooks shall be maintained for each facility where DESH performs radiation protection activities
- Log entries shall:
 - Contain only fact, pertinent data, and the time of entry
 - NOT contain conjectures, opinions, and unrelated information
 - NOT contain classified information or Personally Identifiable Information (PII)
- Close out logbooks at the end of the calendar year and initiate new logbooks at the start of each calendar year

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Records Management System Requirements

General Logbook Requirements:

- The following are required to be recorded into a logbook:
 - Abnormal or upset facility conditions affecting safety
 - Responses to indication of radon
 - Changes to radiological postings/conditions
 - Radiological incidents or occurrences that were not recorded in Radiation Protection Initial Notifications and emergency actions taken
 - Failure to complete compliance activities within the required timeframe and the actions taken and personnel notified
 - Radiological alarms, NOT including spurious alarms from hand-held personnel contamination monitors, e.g. Ludlum 214



Enabling Objectives Review

- ✓ EO1: Recognize types of radiological records in use at LANL.
- ✓ EO2: Recognize radiological work controls contained within Radiological Work Permits (RWPs).
- ✓ EO3: Describe the RPIN system.
- ✓ EO4: Explain the Electronic Document Records Management System and locate RP procedures using the EDRMS or other methods.
- ✓ EO5: Explain the requirements for the records management system, such as Quality Control (QC), auditability/retrievability, and management information at LANL.



